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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4 W.K., E.H., M.M., R.P., M.B.,
D.P., A.F., C.A., R.K. and K.P.,

PL Sum. J.
Ex. 025

5 Plaintiffs,

CIVIL ACTION NO.:
1:20-CV-05263-MHC

6 vs.

7 RED ROOF INNS, INC.; FMW RRI
NC, LLC; RED ROOF FRANCHISING,
LLC; RRI WEST MANAGEMENT, LLC;
8 VAHARI HOTEL, LLC; WESTMONT
HOSPITALITY GROUP, INC.;
9 and RRI III, LLC,

10 Defendants.

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14 VIDEOTAPED DEPOSITION OF M.M.

15 November 11, 2021

16 10:30 a.m.

17 1960 Satellite Boulevard, Suite 4000

18 Duluth, Georgia

19 Carolyn M. Carboni, RPR, RMR, CCR-B-878

20 Eric Lucas, Videographer

21

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1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in W.K., et al. v. Red
3 Roof Inns, et al. case:

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11 On behalf of the Plaintiffs in Jane Doe, et al. v.
12 Westmont Hospitality Group, et al. case:

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15 as noted in person)

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3 Inns, et al. case:

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9 On behalf of the Defendants Red Roof Inns, Inc.;
10 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI
11 West Management, LLC; Westmont Hospitality Group,
12 Inc.; and RRI III, LLC:

13 ADI ALLUSHI, ESQUIRE

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9 On behalf of Defendant HJA Enterprises in E.F. v.
10 Red Roof Inns, et al. case:

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12 noted)

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1 APPEARANCES (Continued):

2 On behalf of Defendant Sai National Hospitality

3 Ventures in E.F. v. Red Roof Inns, et al. case:

4 C. SHANE KEITH, ESQUIRE

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10 Also Present:

11 Rebecca Webb, Paralegal

12

13

14

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16 (Pursuant to Article 10(B) of the Rules
17 and Regulations of the Georgia Board of Court
18 Reporting, a written disclosure statement was
19 submitted by the court reporter to all counsel
20 present at the proceeding.)

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Page 21

1 disclosed. And we'll discuss some of them in more
2 detail later on, but I just want to make sure we
3 have a full list of everybody you believe has
4 information about your allegations and the claims
5 in this lawsuit.

6 And the first one is [REDACTED], and it
7 says [REDACTED] was one of your traffickers; is that
8 correct?

9 A Yes, sir.

10 Q And then the second one is Forrest
11 Castille. And it says, "Forrest Castille is a
12 Smyrna Red Roof Inn employee that interacted with
13 you over 20 times and informed you about the Smyrna
14 Red Roof Inns do not rent list."

15 It says, "Mr. Castille served as a lookout
16 for [REDACTED], calling to inform him when police
17 were present, and looked after M.M. and other
18 victims of sex trafficking in the hotel. [REDACTED]
19 paid Mr. Castille for the services."

20 Is that correct?

21 A Yes, sir.

22 Q And I'll go into more details about Mr. --
23 the over 20 times and the conversations, we'll
24 discuss those a little bit later. But have you
25 been informed that Mr. Castille gave a deposition

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1 under oath? Do you know about that?

2 A Yes, sir.

3 Q Okay. Did they tell you what he said?

4 A No, not exactly, sir.

5 Q They just told you that he was deposed?

6 A Yes, sir.

7 Q And then the next page, there's a -- the
8 name of -- the person listed there under name is
9 Barry. You don't know Barry's last name, correct?

10 A No, sir, I don't.

11 Q And Barry was also a Red Roof -- Smyrna
12 Red Roof employee that interacted with you over 10
13 times; is that correct?

14 A Yes, sir.

15 Q And you also allege that Barry was a
16 lookout and received money from your traffickers;
17 is that correct?

18 A Yes, sir.

19 Q Okay. Next you have security guard, and
20 it says, contact information, "Unknown. M.M.
21 recalls frequently interacting with a security
22 guard at the Smyrna Red Roof Inn."

23 You don't recall the name as we sit here
24 today?

25 A No, sir, I do not.

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1 Q And we'll talk about that in a moment.
2 But the allegations in the -- in your complaint --
3 and I really want to understand where you were
4 living between 2011 and 2017. You allege that you
5 stayed at the Smyrna Red Roof Inn between 2011 and
6 2017; is that correct?

7 A 2010 and two thousand and -- I was with
8 different people, so approximately maybe 2010 to
9 2012, I was at the Red Roof Inn quite a bit with
10 [REDACTED]. And again, later in two
11 thousand and -- approximately maybe give or take
12 '17, with T and his working girlfriend supposed to
13 be [REDACTED].

14 Q Okay. So let's --

15 MR. KEITH: I'm sorry. What year was that
16 again?

17 MR. ALLUSHI: '17.

18 BY MR. ALLUSHI:

19 Q Let me just direct your attention -- and
20 we'll come back to these addresses. But let me
21 just direct your attention to your response -- your
22 response to interrogatory number 12.

23 A What page is that, sir?

24 Q Go to page 24, please. It says here under
25 the last paragraph, "Her," meaning you,

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1 "trafficking at the Smyrna Red Roof Inn likely
2 began in or about 2011, after her first child was
3 born and adopted out. She recalled being at this
4 hotel through 2012, and off and on until 2017."

5 So you're saying this is incorrect?

6 MR. TONGE: Objection.

7 BY MR. ALLUSHI:

8 Q You can answer. Is this incorrect,
9 [REDACTED]?

10 A I don't really know. Some of that time is
11 a blur to me.

12 Q Well, it's important. Are you alleging
13 that you were at the Red Roof Inn in 2010 or not?

14 A Yes, I was in the Red Roof Inn in 2010.

15 Q So then this is incorrect, and 2010 is the
16 right year that you allege you started staying at
17 the Smyrna?

18 MR. TONGE: Objection.

19 BY MR. ALLUSHI:

20 Q Correct?

21 A I'm not understanding what you're saying,
22 sir.

23 Q [REDACTED], in the complaint, as well this
24 I just read, you have alleged you started staying
25 at the Smyrna hotel in 2011. I'm simply asking:

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1 Is 2011 or 2010 the right year?

2 MR. TONGE: Objection.

3 A About, I said about. It could be at the
4 end; it could be at the beginning; somewhere about
5 around that time.

6 BY MR. ALLUSHI:

7 Q Okay. So it could be at the end or the
8 beginning of 2011, but you don't say 2010 here?

9 MR. McDONOUGH: Objection.

10 MS. MYKKELTVEDT: Objection. She's
11 answered the question.

12 BY MR. ALLUSHI:

13 Q So you believe you stayed at the hotel in
14 2010; is that correct? I'm just trying to
15 understand if you stayed at the hotel in 2010.

16 A About in the beginning, towards the end of
17 2010, beginning of 2011.

18 Q Okay. Between 2017 and 2018, immediately
19 the next -- we're back at page 8, back to your
20 residences. You have an address here from 2017 to
21 2018, that 2401 Windy Hill Road, Marietta, Georgia.
22 What is that address?

23 A I can't recall.

24 Q Okay. Is that a hotel or a home, do you
25 know?

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1 after losing my third child.

2 Q And why that area is my question? Why not
3 downtown Atlanta? Why not Buckhead? Why not Inman
4 Park? Like why not -- why the Red Roof Inn in
5 Smyrna? Did you know somebody there? Had you been
6 there before?

7 A I don't remember to be very honest with
8 you, sir. I don't remember.

9 Q And so you voluntarily went to the Red
10 Roof Inn Smyrna and checked in?

11 A Yes.

12 Q And this was 2010?

13 A Somewhere after having my third child,
14 yes, sir.

15 Q And how long were you at the Red Roof
16 Smyrna when you moved in, do you recall?

17 A I do not recall how long I stayed there,
18 sir.

19 Q Were you prostituting yourself when you
20 moved back to Georgia and started living at the
21 Smyrna Red Roof Inn in 2010?

22 A No, sir, I was not.

23 Q Did you get a job?

24 A I don't even recall, sir.

25 Q Was [REDACTED] your first pimp here

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1 in Georgia in 2010 following the 2010 return?

2 A Yes. [REDACTED] was the first person
3 that -- that -- yes, he was the first person.

4 Q How did you meet [REDACTED]?

5 A I met [REDACTED] in the streets, somewhere in
6 Windy Hill. I can't -- I do not recall exactly
7 when, exactly where. We had crossed paths. And he
8 had made it aware to me that he sold drugs.

9 Q So you were trying to buy drugs on the
10 streets, and that's how you met [REDACTED]?

11 A I was looking for drugs, yes, and came
12 across [REDACTED].

13 Q And with drugs, what you mean is crack
14 cocaine?

15 A Crack cocaine or weed, sir.

16 Q And did you, in fact, buy initially drugs
17 from [REDACTED]?

18 A I don't remember, like, the specific day,
19 sir, that I bought drugs from [REDACTED]. When I first
20 met [REDACTED] he gave me some free drugs, and I
21 probably bought some drugs from him, sir.

22 Q Did you have sex with him?

23 A No, sir, not when I first met him, I did
24 not. My thought of [REDACTED] was that he was a --
25 though he was a drug dealer, he might have been a

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1 was staying at the Masters Inn right on the other
2 side. And when [REDACTED] officially broke me in, which
3 is pretty much, you now do what he says, by his
4 rules, when he says or else.

5 Q Okay. Let me just step back here for a
6 moment. You said when you were staying at the Red
7 Roof Inn, you gave your debit card to someone?

8 A Yeah.

9 Q And why?

10 A Because I was too high and I was paranoid
11 to go to the Wells Fargo across the street.

12 Q You needed cash?

13 A Yes.

14 Q To buy drugs?

15 A Yes.

16 Q Crack cocaine?

17 A Yes.

18 Q And did you know this person?

19 A Not really.

20 Q And did this person steal your money?

21 A No, they had my pin number. They took off
22 with my bank card and everything.

23 Q They did steal your money?

24 A Yeah. Well, they stole the bank card. I
25 don't know. I'm sure they -- I can only assume

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1 that they had my pin, sir, and that they went to
2 the account and withdrew money.

3 Q Well, did you look at the account
4 afterwards?

5 A No, I didn't.

6 Q To this day, do you know if that guy took
7 the money?

8 A I know nothing. I just kind of let it go
9 and called it -- and chucked it a loss because...

10 Q Did you have online access to the bank?

11 A Probably not. I don't know for sure, sir.

12 Q How much money was in the bank?

13 A Somewhere possibly close to 15 to 200,
14 maybe. Maybe less, maybe -- maybe a little bit
15 more. I don't recall exactly how much, sir.

16 Q 50 to 200, you're saying?

17 A 1500 to possibly 2,000.

18 Q 2,000?

19 A Maybe a little less; maybe a little more.
20 I don't -- I'm not -- I can't say for sure, sir.

21 Q So you never went to the -- did you never
22 go to the bank to check if the money was still
23 there?

24 A I don't ever recall going to the bank.

25 Q That's a lot of money, right, 1500 to

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1 2,000?

2 A Yes, sir.

3 Q Why didn't you go to the bank to see if
4 you still had the money?

5 A I was highly depressed after giving up my
6 kid, and I just called it a loss for a bad decision
7 on my part.

8 Q So then you had --

9 A I had a little bit of cash -- I'm sorry.
10 Go ahead, sir.

11 Q Go ahead. Please, please.

12 A I apologize.

13 Q No, no. Go ahead.

14 A I had maybe a little bit of cash left on
15 me, enough to get a new hotel room after the police
16 searched my room that night. And I was like, oh,
17 I'm getting the hell up out of here, like the cops
18 just came in and flipped my bed up under -- like
19 lifted my whole bed looking for drugs and didn't
20 find anything and walked out of my room.

21 And I was like, oh, no, I'm not going back
22 to that, I'm not, huh-uh, I'm not staying here any
23 longer. I didn't feel like that was a good move.

24 Q Why? Are you worried about the police?

25 A Yeah, I was worried about the cops.

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1 of my money. And [REDACTED], because I had been buying
2 drugs from him, like I said before, sir, had given
3 me some drugs while I was at the Magnuson. And,
4 you know, with a little bit of money I might have
5 had on me, you know, I bought some drugs from him.

6 One day -- do you want me to continue,
7 sir?

8 Q Yes, please.

9 A Okay. One day, sir, while [REDACTED] was gone,
10 he said he had to go reup. That means he has to go
11 back to his plug, whoever his gets his dope from,
12 his crack from, and buy another batch because he
13 had no more.

14 [REDACTED] was gone almost all day, and I
15 wanted to get high. And I had -- I think I had met
16 somebody else in the hotel or in the area, I don't
17 remember where, who, when, but I did buy drugs from
18 somebody else.

19 [REDACTED] -- somehow we reconnected. Like
20 maybe he called me, maybe he texted me, he was
21 back. Maybe he knew where I was staying at the
22 Magnuson. You know, maybe he came and knocked on
23 my door. I don't remember exactly how that
24 transpired, sir.

25 He came in from the back side, if I

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1 remember correctly, and he came in to let me
2 supposedly try his new batch of crack that he had
3 just picked up. And [REDACTED] confronted me and asked
4 me, he said, "So I heard you bought drugs from
5 somebody else today."

6 And I said, yeah, casually, like yeah,
7 like you weren't here, you were gone for like six
8 hours, like, you know, like it wasn't a problem.
9 Like, "Yeah, why, what's up?"

10 [REDACTED] proceeded to -- [REDACTED] walked into my
11 bathroom staring at himself in the mirror. He
12 pulled out his bomb of crack, which is just the
13 quantity of crack he had in a large amount. He put
14 it on the counter. He pulled his cigarettes out of
15 his pocket, and he lit the filter of his cigarette
16 and he burnt me on my chest. And he said, "Bitch,
17 you're not going anywhere. You belong to me now."

18 And I looked at him in shock, scared, and
19 I said, "You're a real ATL pimp. I don't think I'm
20 ready for this."

21 But he pretty much told me I had no
22 choice. The honeymoon phase with [REDACTED] lasted a
23 little while. I was able to keep my room. [REDACTED]
24 said he was going to teach me how to make some
25 money so I could pay for my room, and he would do

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1 like 50/50 with me, you know, so I could pay for my
2 room and I could still support my habit.

3 That didn't last very long, though. That
4 honeymoon phase was soon over. I had to -- he said
5 he was going to, like, help me pay my room, like if
6 I pay half of it with the money I have, he'll help
7 me pay half, you know, like, but I still had to
8 give him 50 percent of what I made because [REDACTED]
9 was putting all my posts up for me in the
10 beginning. He was posting because I had no idea
11 about Backpage. I had no idea about anything. I
12 didn't know about this stuff. I mean, I had
13 experienced it from when that girl did it, but I
14 had never put up my own posts. So he put them up
15 for me.

16 And shortly after, maybe not even a week
17 later, I had to move out of my room. He said he
18 didn't have the money to help me pay for my room,
19 but he was still periodically here and there giving
20 me free drugs. And soon that honeymoon period was
21 over.

22 I think I went to [REDACTED] -- ended up
23 going to [REDACTED] room at the Masters for maybe a
24 night. There was no dates turned, like no tricks,
25 whatever you guys would like to call them, done at

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1 Q And how long were you at the Red Roof Inn?

2 A I was at the Red Roof Inn numerous times
3 for a week, maybe two weeks, maybe a little more,
4 maybe a little less. But I was there numerous
5 times.

6 Q And you allege that [REDACTED] was your pimp
7 and he forced you to do the -- to do this between
8 2010 and 2012, correct?

9 A Those dates might be a little jumbled as
10 I've forgotten situations that I have been through
11 that I've probably tried to block out. But I have
12 been at the Red Roof Inn numerous times with [REDACTED]
13 [REDACTED]

14 Q And numerous times you mean more than
15 five?

16 A Probably.

17 Q Less than 10?

18 A I can't really say. I don't really know.
19 I was there numerous times.

20 Q What other hotels did you stay with [REDACTED]
21 aside from the Magnuson Inn and the Masters Inn?

22 A The Country Hearth Inn.

23 Q Country Hearth Inn?

24 A Yes, sir. And the Days Inn.

25 Q Which Days Inn?

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1 A Off of Windy Hill behind the -- is that a
2 Drury Inn? I don't know what it is. It's on the
3 same road now that the SunTrust stadium is off of,
4 sir. I don't know what that road is. Kind of
5 close to McDonald's across from some apartments
6 over there not far from the parking area for the
7 SunTrust stadium.

8 Q So the -- any other hotels?

9 A Not in -- in Marietta, not that I can
10 remember. But I've stayed in numerous hotels in
11 numerous places throughout Georgia with [REDACTED].

12 Q Okay. I'd like -- I'd like you to tell me
13 all the hotels that you stayed with [REDACTED], I don't
14 care where in the state of Georgia, where you were
15 allegedly forced to have sex against your will for
16 money. You said -- we've already discussed --

17 A I didn't --

18 Q Let me finish the question. We've already
19 discussed the Magnuson Inn. We've discussed the
20 Red Roof in Smyrna. You said the Country Hearth
21 Inn. You said the Days Inn off Windy Hill. What
22 else have we got?

23 A A hotel -- I don't know if it's an Econo
24 Lodge or what it was in College Park by the
25 airport. Maybe it was Virginia Avenue. I don't

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1 know. The Best Western, I think, on Virginia
2 Avenue.

3 He took me to Columbus, Georgia. I don't
4 know what it is. It's next to a Days Inn in
5 Columbus, Georgia. I don't remember the name of
6 the hotel. He took me to, like, some type of
7 Travelers Lodge, trucking, where a lot of truckers
8 were towards Savannah. These hotels we never
9 stayed at long, but many times we went back to the
10 Red Roof because that's where [REDACTED] felt the
11 safest.

12 The majority of the time after we came
13 from out of town, came from Columbus, came from
14 Savannah, we'd go back to the Red Roof Inn because
15 that's where [REDACTED] knew he was safe.

16 Q We'll get to that. I understand. I'm
17 trying to under -- to get a list of all the hotels
18 you stayed in, ma'am.

19 A I am explaining them to you, sir, but I'm
20 letting you know that Red Roof was always home base
21 to go back to because that's where he was safe at
22 or he felt he was safe.

23 Q Okay. So any other hotels?

24 A There's a hotel by Turner Field. I don't
25 know what the name of it is. It's close, very

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1 close to the highway. I don't know the name of it.

2 And I have -- and [REDACTED] had taken me to
3 Alabama once and...

4 Q Do you recall the name of the hotel you
5 stayed in Alabama?

6 A I do not. I think we stayed in maybe two
7 different hotels, and it was like a night here and
8 then a night there. But there's an incident that
9 happened and we left and came back.

10 Q What incident happened?

11 A The client wanted two girls. He had
12 already seen one girl. Had already done his -- had
13 already ejaculated, and then decided he wanted the
14 two girls -- he wanted two girls. And he could not
15 perform and ejaculate within the time that he was
16 given. And the guy spazzed out and was, like, chop
17 on deck, which is apparently a big gun. And we --
18 after he left, [REDACTED] packed our shit -- oh, sorry,
19 packed our stuff and we came back to Georgia.

20 Q And was there another girl involved in
21 this incident?

22 A There was another girl that he had met in
23 Alabama. I don't know who she was, but [REDACTED] and I
24 packed our stuff and came back.

25 Q How many hotels would you -- I mean, I

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1 think you've named one, two, three, four, five,
2 six, seven, eight -- you've named nine either
3 hotels by name or, you know, you don't recall their
4 names. How many hotels, aside from the Red Roof
5 Inn Smyrna, would you say that you stayed with
6 [REDACTED] from 2010 to 2012 and you were held against
7 your will?

8 A He didn't hold a gun to my head, sir. I
9 clearly stated before that from the first time that
10 he burned me with that cigarette, I was terrified.
11 And I figured my best bet is to just go along with
12 what he's doing. To go along, out of fear, because
13 I now knew at this point that he did carry a gun on
14 him. If I would have tried to run, for example, at
15 the Red Roof, sir, everybody knew me, apparently
16 because I was with him, and somebody would have
17 told him. So there's no telling what would have
18 happened with his rage and his anger and his own
19 issues of drug abuse.

20 Q Between 2010 and 2012, did he ever
21 threaten with a gun -- threaten you with a gun if
22 you left?

23 A No. It was more by acts of threats. Not
24 to say he hadn't physically harmed me, pushed me,
25 hit me, slapped me, knocked me down.

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1 BY MR. ALLUSHI:

2 Q [REDACTED], we were discussing the time
3 that [REDACTED] was your pimp between 2010 and 2012.
4 While you stayed at the Red Roof Inn with [REDACTED],
5 did you -- did you ever call the front desk?

6 A I may have.

7 Q Did you ever tell the front desk you were
8 being held against your will?

9 A No. I pretty much assumed they had
10 already known because [REDACTED] felt so safe there to
11 go back as many times as we did.

12 Q But you never told them you were being
13 held against your will?

14 MR. BAUMRIND: Objection.

15 BY MR. ALLUSHI:

16 Q Correct?

17 MR. BAUMRIND: You can answer that,

18 [REDACTED]

19 BY MR. ALLUSHI:

20 Q You can answer that.

21 A No, I did not.

22 Q Did you call any other departments at the
23 hotel while you stayed there with [REDACTED]?

24 A Please explain "departments."

25 Q Housekeeping, any other --

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1 A You have to call the front desk to get
2 housekeeping stuff.

3 Q Did you ever tell any employees at the Red
4 Roof Inn Smyrna between 2010 and 2012 you were
5 being held against your will?

6 A I didn't tell them I was being held
7 against my will, but they knew what I was doing
8 because I had told them and they pretty much
9 already knew what I was doing there with [REDACTED].

10 MR. KEITH: Objection.

11 BY MR. ALLUSHI:

12 Q I'd like you to answer with a yes or no.
13 Did you tell any of the employees you were being
14 held against your will?

15 A No.

16 MR. TONGE: Objection.

17 BY MR. ALLUSHI:

18 Q Did you tell any of the employees that you
19 were forced to have sex with men for money against
20 your will at the Smyrna hotel?

21 MR. TONGE: Objection.

22 A No.

23 BY MR. ALLUSHI:

24 Q Did you ever call Red Roof corporate to
25 report what was occurring?

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1 A No.

2 Q And between 2010 and 2012, you say that
3 you were the entire time scared of [REDACTED], that's
4 why you never ran, correct?

5 A Yes, sir.

6 Q What about in 2011, when you went to
7 Florida, the incident we just described where you
8 were prostituting yourself there, how did you get
9 away then?

10 A The lady that -- [REDACTED], the arrestee,
11 she was taken to jail that night. She went to
12 jail, so I was -- I no longer had to be with her.

13 Q Maybe I'm misunderstanding here.

14 A She went to jail. It says arrestee. That
15 means she got arrested. She went to jail that
16 night.

17 Q Well, you said she wasn't your pimp,
18 right? You testified earlier she wasn't your pimp
19 and you voluntarily went to Florida and prostituted
20 yourself. That was the testimony earlier.

21 A Yes, she went to jail that night.

22 Q So between 2010 and -- my question,
23 [REDACTED], let me -- allow me to repeat it again,
24 was between 2010 and 2012, while staying at the --
25 partially staying at the Red Roof Inn Smyrna, you

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1 say you were under the control of [REDACTED] and could
2 not leave, correct?

3 A Yes.

4 Q But then you left in 2011 to go to Florida
5 with [REDACTED], correct?

6 A Yes.

7 Q And so you could leave, you weren't under
8 the control of [REDACTED], were you?

9 MR. BAUMRIND: Objection.

10 MR. TONGE: Objection.

11 A I don't even understand what you're saying
12 when you're asking that, sir. I'm confused.

13 BY MR. ALLUSHI:

14 Q In 2011, you left to go to Florida with
15 [REDACTED]?

16 A Yes, sir.

17 Q Where was [REDACTED]?

18 A I don't know. I don't know that I had run
19 across [REDACTED] at that time yet. Maybe. I don't --
20 like I said, sir, a lot has happened in the 37
21 years I've been on this earth.

22 Q You testified, [REDACTED], that between
23 2010 and 2012 -- I asked you several times, and you
24 said between 2010 and 2012, you were scared to
25 leave [REDACTED]?

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1 MR. TONGE: Objection.

2 BY MR. ALLUSHI:

3 Q Correct?

4 A Yes.

5 Q And in 2011, and specifically, in
6 April 28th of 2011, you were in Florida with
7 [REDACTED] prostituting yourself?

8 A Okay. Yes, sir.

9 Q And so my question is: How did you get
10 away from [REDACTED]?

11 A I may have not ran across [REDACTED] exactly at
12 that point. I don't -- things are a little bit
13 blurry. Like it's...

14 Q Well, [REDACTED], you're alleging that at
15 the Red Roof Inn Smyrna in 2011, you were being
16 held against your will and forced into sex
17 trafficking. And here it is in 2011 a police
18 report showing that you were in Florida
19 prostituting yourself. Can you explain that to us?

20 A I'm going to need you to say that again,
21 please, sir.

22 Q You allege in your complaint, in your
23 lawsuit against my clients, you allege that in
24 2011, that entire year in 2011, you were being held
25 against your will and forced into sex at the Smyrna

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1 hotel, Red Roof Inn.

2 MR. TONGE: Objection.

3 BY MR. ALLUSHI:

4 Q But here's a police report you're in
5 Florida prostituting yourself in 2011. Can you
6 explain that?

7 MR. TONGE: Objection.

8 MR. BAUMRIND: Objection.

9 A I said between 2010 and 2012, sir. 2010
10 and 2012. My understanding is that that gives me
11 some type of gap. It might not have been
12 exactly -- I don't -- I can't -- I don't know --

13 BY MR. ALLUSHI:

14 Q So you were free to leave [REDACTED] and go to
15 Florida and prostitute yourself?

16 MR. TONGE: Objection.

17 MR. BAUMRIND: Objection.

18 A No, I was not free to leave [REDACTED]

19 BY MR. ALLUSHI:

20 Q Well, you met [REDACTED] in 2010. You
21 testified that you met [REDACTED] in 2010, correct?

22 A Yes.

23 Q And then shortly thereafter, you testified
24 you were scared to leave because of the cigarette
25 incident, correct?

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1 A Yes.

2 Q And that was only 2010. We discussed that
3 on the record. And then in 2011, you drive down to
4 Florida with [REDACTED] and prostitute yourself. How
5 did you get away from [REDACTED] is the question?

6 A There was -- as I stated earlier, that I
7 was in Columbus, Georgia, at a hotel next to the
8 Days Inn with [REDACTED]. [REDACTED] had pressured me and
9 forced me to do a certain date with a client. It
10 was an out call. And it was at somewhere like -- I
11 don't know, is there, like, a Phenix, Georgia,
12 somewhere close to Columbus maybe?

13 MR. KEITH: Phenix City, Alabama?

14 THE WITNESS: I don't think it was
15 Alabama. We weren't even --

16 MR. KEITH: It's right across from
17 Columbus.

18 A Oh, maybe. I didn't know that. I didn't
19 even know I was in Alabama.

20 And so this client had sent pictures of
21 all the money, his house and things that he had.
22 When the -- when the guy had hit the phone, I tried
23 to show [REDACTED], like, this is probably not real.
24 You know, somebody that's going to show all this
25 flashy stuff, you know, is probably not the real

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1 thing.

2 He said he was going to pay -- I don't
3 remember the allotted amount. He said he was going
4 to pay whatever the amount was. I got to the
5 place, this house. It was on a street, there was
6 houses on both sides, in Phenix City. And the guy
7 meets me there. We go up to the top of the house,
8 like an attic or something. We do our -- we
9 handled business. I handled business. But before
10 I handled business, I asked the gentleman for the
11 gift, the donation, in other words, for the money
12 without saying it.

13 The guy tells me that he is going to give
14 it to me after we are done. I informed [REDACTED], and
15 I let [REDACTED] know that he was not willing to give it
16 up until we were done. [REDACTED] told me, with clear
17 instructions, "You better do that date and make
18 sure you come back with that money."

19 I went ahead and did the date without
20 getting the money first. When we were done, the
21 guy said that "I'm going to run out" -- it was --
22 it might have been a little bit cold out. I don't
23 really remember when exactly it was. The guy said,
24 "I'm going to go downstairs. I'm going to go and
25 get the car and pull the car around."

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1 He never came back. He never showed back
2 up.

3 There was a cop sitting across the street,
4 and I made up a story that I was over here with
5 some friends of some friends, and that everybody
6 got drunk and I got left behind. I told him where
7 I was staying. I had even called [REDACTED] so he could
8 hear that I had gotten a random cop in Phenix City
9 to drop me back off at the hotel. The cop didn't
10 come up to the room with me. Didn't do nothing.

11 I got back up to the room, and [REDACTED] tore
12 through all my stuff saying that I had the money,
13 and I didn't. [REDACTED] left me in Columbus, Georgia,
14 at the hotel that night. I had met an older
15 gentleman who was in the military at the hotel. I
16 told him that my boyfriend and I had gotten into an
17 argument, and that he took off and left me. That
18 gentleman kindly let me sleep on the little
19 pull-out bed in his room at the hotel, and the next
20 morning, he put me on a shuttle back to Atlanta.

21 From the -- from the airport back to the
22 hotel, I don't really remember -- from the hotel
23 back -- from the airport back to Marietta, I do not
24 remember clearly how I got back. I think I had --
25 my friend Mimi had known this -- a guy who was a

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1 friend of hers, he happened to be staying at the --
2 at a hotel, and that was when I met [REDACTED]. What
3 hotel it was, I do not remember.

4 I ended up going down to Florida with this
5 woman, being that I had no money at this time.

6 [REDACTED] had taken -- was collecting all of my money
7 that I had been making. I went down to Florida
8 with this -- with this girl in hopes to make some
9 money, get on my feet, and try and figure something
10 back out when I could go back -- when I went back
11 home. Well, not even home. Back to Marietta.

12 I don't even remember how I got home from
13 Florida. At some point when I returned back, I ran
14 into [REDACTED] again. And just seeing [REDACTED] for the
15 first time after being gone for a little while, I
16 was again paralyzed in fear. He saw me. He knew I
17 was back in Marietta by Windy Hill. Like no hotel
18 that I went to could I really hide from him. I
19 obviously couldn't go to the Red Roof because, you
20 know, at that moment, they probably would have told
21 him I was there.

22 And at some point, [REDACTED] had convinced me
23 and talked me into going back with him, and I did
24 it out of fear. And the same cycle started. He
25 fed me dope. I worked. He kept me high.

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1 Now, mind you, though, if I didn't -- if
2 my phone wasn't ringing, I was pushed to the street
3 to walk Windy Hill, which was known back then as a
4 track. A track is a strip of road that is known
5 for women to walk to make -- to catch dates.

6 BY MR. ALLUSHI:

7 Q Let me understand this right, [REDACTED].
8 [REDACTED] abandons you at some time in the middle of
9 the alleged trafficking. You go down with [REDACTED]
10 you go down to Florida. You're down there for some
11 time. Then you decide to come back to Georgia on
12 your free will and hang out in the same area where
13 you were hanging out with [REDACTED] before, did I get
14 that right?

15 MR. BAUMRIND: Objection.

16 A I knew no other place. I knew --

17 BY MR. ALLUSHI:

18 Q Why did you come back to Georgia?

19 A Because this is where I -- this is where I
20 was merely living, existing, whatever you want to
21 call it. This is where I was. Like even -- even
22 though I wasn't close to my -- even though I
23 couldn't have this with my brother at this point,
24 it still made me feel good at some point to be
25 close to family. God forbid something change and

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1 they decide to invite me back into their lives.

2 Q Why didn't you get a job in Florida if you
3 were so scared of [REDACTED] and everything that he had
4 done to you? Why didn't you stay in Florida and
5 get a job?

6 A Who am I going to stay with in Florida,
7 sir? I had nobody in Florida. I had nobody in
8 Florida where I was, that I knew anybody. Not to
9 mention, sir, Florida is way too expensive.

10 After coming out of that situation with
11 [REDACTED] and then thinking -- my best thought was that
12 I could make some fast money and get on my feet and
13 find a -- and that [REDACTED] probably would have just
14 moved on, but [REDACTED] lingered in that area, and I
15 ended up running across him again.

16 Q What did you do with the money you made
17 with [REDACTED]?

18 A I had a few dollars left over. And part
19 of the reason -- part of what I -- to the best of
20 my knowledge, sir, when the officers arrested her
21 that night, they said, "You can give her back the
22 money in which she has given you and which she has
23 made, otherwise, we are taking you to jail."

24 And Ms. [REDACTED] chose to go to jail. And
25 then started saying, "I'll give you my dope boys, I

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1 will give you my drug dealers," trying to get out
2 of it.

3 Q Did you think about calling your brother
4 when -- before coming back to Georgia or on the way
5 back and saying -- asking for help?

6 A No, not at all. For my brother to say no
7 to me, for my dad to say the same thing, you got
8 yourself into this, you figure your way out of it,
9 that's the way my family is. You get yourself into
10 some crap, you better figure out your own way.

11 My best thought was to go to Florida, make
12 some money, come back and try and figure out -- get
13 a job, do something different. I was in a
14 completely vicious cycle that I had -- my best
15 thinking I couldn't get my way out of.

16 Q But you voluntarily came back to Georgia
17 and you voluntarily came back to the same Windy
18 Hill area, correct?

19 A Yeah. Yes, sir, I did.

20 Q Where you knew [REDACTED] would likely be?

21 MR. TONGE: Objection.

22 A No, I did not know [REDACTED] would likely be
23 there. Being that we had traveled so much
24 throughout Georgia, I figured that [REDACTED] would go
25 somewhere else and find another girl.

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1 BY MR. ALLUSHI:

2 Q And when you got back, you said you ran
3 into [REDACTED] again. Where?

4 A At the BP on Windy Hill.

5 Q And what happened?

6 A He said, "Hey, Gummy," short for my
7 nickname of Gumdrop. You know, I tried to be like
8 almost cordial like and not make a big scene. And
9 somehow I just got scared when I saw him. I just
10 got terrified.

11 And I figured I -- at that point, I knew I
12 probably shouldn't have went back to Windy Hill. I
13 probably shouldn't have done -- you know, went
14 back. But that was, like, the only place I knew
15 that I could kind of maneuver and maybe figure
16 something out.

17 Q You said earlier that [REDACTED] home base
18 was the Red Roof Inn Smyrna. If that was his home
19 base and that's where he was feeling the safest, as
20 you called it earlier, why wouldn't he be there
21 when you got back?

22 MR. BAUMRIND: Objection.

23 A I don't know where he was, but he was at
24 the BP gas station is where I saw him.

25 BY MR. ALLUSHI:

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1 Q No, no, my question, [REDACTED], was: You
2 said you thought [REDACTED] wouldn't be at the Smyrna
3 area when you got back from Florida. My question
4 was: Earlier you testified that that's -- that was
5 [REDACTED] home base. That's where he felt the safest
6 allegedly at the Smyrna -- at the Smyrna Red Roof
7 Inn. So when you were coming back, why would
8 you -- why would you think he wouldn't be there if
9 that's where he felt the safest?

10 A Because he had other places he went. Like
11 he had family in Stockbridge. He had people that
12 he knew on Cleveland Avenue. He had a multitude of
13 places that he could go.

14 But as far as pimping a girl, the Red Roof
15 was his safest because the employees knew [REDACTED].

16 [REDACTED] had given them weed before. [REDACTED] had sold
17 weed to them before. [REDACTED] knew them. [REDACTED] --
18 those were like not [REDACTED] friends but [REDACTED]
19 friends. Like they were familiar with [REDACTED]
20 [REDACTED] was familiar with them. He knew that if --
21 that if -- while he was at the room at any time, if
22 police were on property, they were going to call
23 the room and say: Hey, look, the cops are here.
24 Chill out for a minute. Whatever. Put your stuff
25 away. Whatever it was. Don't come outside. Spray

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1 your room down. Whatever it was. They let him
2 know everything.

3 Q So why wouldn't he be there when you got
4 back if they did all that for him?

5 MR. BAUMRIND: Objection.

6 A I have absolutely no idea why [REDACTED]
7 wouldn't be there because I'm not [REDACTED], but he was
8 on Windy Hill at that gas station. I didn't ask --
9 I did not ask [REDACTED], where are you staying? I
10 didn't even do that.

11 BY MR. ALLUSHI:

12 Q [REDACTED], I'm asking you why did you
13 believe he wouldn't be there if all of these facts
14 you allege are true?

15 MR. BAUMRIND: Objection. Are you
16 saying --

17 BY MR. ALLUSHI:

18 Q Why wouldn't he be there?

19 MR. BAUMRIND: When you say "there," what
20 do you mean?

21 MR. ALLUSHI: At the Red Roof Inn Smyrna.

22 MR. BAUMRIND: Okay. She said she saw him
23 at the BP in Windy Hill. I just want to make sure
24 the record is clear.

25 MR. ALLUSHI: I understand, Michael. I

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1 to the Red Roof numerous times. I did not count,
2 sir. I did not mark it off a calendar. I did not
3 do any of that.

4 Q So the -- once you got back with Forrest,
5 you were with him until the end of --

6 A Forrest?

7 Q I'm sorry. With [REDACTED]. Once you got back
8 with [REDACTED] in 2012 -- in 2011, returning from
9 Florida at the BP, how long did that last?

10 A I don't know. It may have been -- may
11 have been up till 2012. It may have been -- you
12 know, a little bit longer. But I was with [REDACTED]
13 for --

14 Q Well, in paragraph 12 of your affidavit --
15 let's see if we can fast track this a little bit --
16 you say, "I escaped from [REDACTED] at some point, but
17 then was trafficked in Georgia by [REDACTED]
18 during approximately 2012 and 2014."

19 So aside from the Florida time where you
20 had either abandoned or left [REDACTED], [REDACTED] left you,
21 then you escaped again from [REDACTED] following that?

22 A Correction, sir. I was in Columbus,
23 Georgia, not in Florida with [REDACTED].

24 Q Aside from the Florida travel episode we
25 discussed --

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1 A I did. I told him I would help him, and I
2 felt personally obligated to help him as he had put
3 a roof over my head.

4 Later down the line is when he became
5 violent if I wasn't making enough money or if I
6 wasn't trying or if I was eating too much food in
7 his house and not doing enough for him.

8 You know, when Jimmy got fired from the --
9 from -- when Jimmy got fired from the Masters Inn,
10 excuse me, and the other hotel he was working at,
11 but primarily the Masters Inn, I felt somewhat
12 comfortable at the Masters Inn knowing that I knew
13 the person at the front desk. But I felt like I
14 fit in because it was the same thing that I had
15 seen at the Red Roof. There was pimps. There was
16 girls in short tops and bootie shorts and heels
17 roaming around the property. Girls walking all
18 around the property hotel. People setting -- you
19 could smell weed. Like it was the same exact
20 atmosphere as the Red Roof Inn. But I felt safe
21 this time because I wasn't with [REDACTED]. I knew
22 somebody at the front desk. But it was the exact
23 same atmosphere, so I felt like I could blend in.

24 Q So the Masters --

25 A Unlike I could -- I'm sorry, go ahead.

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1 Q Go ahead.

2 A Unlike I could at the Red Roof. I
3 couldn't really blend in at the Red Roof because
4 all the people at the front office knew [REDACTED], knew
5 that I was working for [REDACTED], and that he had me
6 there. Like I had conversations with Forrest and
7 stuff. I had brought Forrest down weed before.
8 Like I said, he had bought some, he had -- but it
9 was the same exact atmosphere as the Red Roof, so I
10 could figure -- I figured I could blend in.

11 Now I had somebody at the front desk who
12 was not going to accept money from guys or say,
13 hey, I'm looking for this girl, where is she? I
14 felt like I had somebody to protect me because I
15 had told Jimmy about [REDACTED].

16 Q So he was in the hospital, you went back
17 to prostitution to help him out voluntarily; is
18 that correct?

19 A I stayed with him in the hospital, and
20 when he got home is when we really began -- when he
21 really began to need me to work. And as I began to
22 work and he began to give me crack because I
23 explained to him that I would -- that I did not --
24 that smoking crack came along with me prostituting
25 or having sex for money or being with men or

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1 the ground. Bitch, get on the ground." And what
2 he wants you to do is he wants you to get on your
3 hands and knees and shuffle up that money and pick
4 up all that money as fast as you can."

5 After the things that I've been through --

6 Q You dropped your mic.

7 A Yeah, I'm about to plug myself back in.
8 Sorry, guys.

9 Q You ought to see it when you walk away and
10 you've got it on a necktie. You get --

11 A As I was saying, some of the things that
12 I've been through, like with [REDACTED], [REDACTED] my first
13 introduction to him being a pimp, burning me with a
14 cigarette, that's traumatizing for me. Like I --
15 you know, I stay out of fear with things.

16 So [REDACTED] tells me to get on the ground, get
17 on the ground, and I am too scared at this point to
18 get on the ground because I'm -- I don't know what
19 he's going to do to me. He takes me in the
20 bathroom at the Red Roof, in his room, he shuts off
21 some of the lights and goes in the bathroom and
22 shuts the door. And he's standing against the wall
23 with the pillow still on his head leaning up
24 against the wall. So the pillow is a little bit
25 folded and tucked to the wall, but he still has it

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1 over his head. I'm sitting on the toilet, and he
2 yells, "Bitch, get on the ground. Bitch, get on
3 the ground."

4 And I'm trying to say like -- I'm already
5 high myself on crack cocaine. He's high. I'm
6 sitting on the toilet. I'm like, "██████████, it's okay,
7 calm down. Like calm down. It's okay. Like just
8 don't do more -- don't smoke no more. Just chill
9 out for a minute like."

10 So he gets out of the bathroom, he goes
11 and he sits on the bed. He wants me to start
12 touching him, but as he -- he wants me to start
13 touching him sexually with my hands, you know --

14 Q Fondling him?

15 A Yes, thank you. Fondling him. He starts
16 to hit the crack again. And I'm --

17 Q Okay. Is this a one-bedroom or
18 two-bedroom?

19 A Two bed.

20 Q Okay.

21 A So I periodically am sitting on the other
22 bed trying to be calm, but I'm really, like,
23 freaked the --

24 Q You can say it. I know.

25 A I'm freaked the fuck out.

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1 Q Right.

2 A Let's say this square right here is about
3 the quantity that some dope boys, crack dealers,
4 will give you for a \$20 rock. This whole thing,
5 [REDACTED] is putting it in the whole entire pipe. In the
6 tip of his pipe, he is crushing this whole thing
7 and putting it in there. He's not taking little
8 hits of crack. He's taking hits of crack that
9 could definitely explode his heart.

10 Me, I'm not doing the same thing because
11 I'm already scared of him. So he's sitting on the
12 bed, I start to fondle him. He goes to hit it
13 again, and he starts to freak out again.

14 I can't do it, but I'm going to kind of
15 enact it for you guys so you guys can get a visual.
16 Why can't I get a blackboard?

17 Okay. Art is not my thing. Bear with me.
18 Let's say this is [REDACTED] room. Okay? He's sitting
19 on this bed, I'm sitting on this bed. I'm halfway
20 dressed, but right now, I'm trying to slowly, while
21 he's getting high, like slip on one piece of
22 clothing because I'm starting to feel really
23 unsafe. Okay?

24 He's sitting here, I'm sitting here
25 (indicating). These are [REDACTED] curtains, these

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1 squiggly lines are [REDACTED] curtains. This is his
2 front door with the little peephole, okay, and this
3 is his light switch. Okay?

4 He runs up to these blinds and he rips
5 them open. And now the window is wide the hell
6 open and everybody can see that he's naked in the
7 room.

8 The next thing he goes for is the front
9 door. He goes to just rip the front door open, and
10 when he does, the latch is still on, but he screams
11 when it's open, "She's trying to kill me." I
12 totally wiggled the fuck out. He starts tripping.
13 I've got my -- I'm putting on my clothes real fast.

14 And when he went -- he went -- I don't
15 know if he went back to the bathroom for a minute
16 or he turned his back, I bolted and I took off.
17 When I took off, I left [REDACTED] room --

18 Q Uh-huh.

19 A -- from this side, and I went the side
20 closest to the dumpster to the back of the Target.

21 Q To the back, yeah.

22 A And I hid behind a car on the front side.
23 From what I was told by employees that I had known,
24 Forrest, Barry, I don't remember which one, and
25 that [REDACTED] had also heard, he ran to the room butt

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1 naked with no fucking clothes on. And they gave
2 him -- look what they gave him, a washcloth to
3 cover himself.

4 Q He ran to the office?

5 A He went to the front desk at the office at
6 the Red Roof Inn. [REDACTED] had stayed there for a
7 while. I'm sure people figured out what he was
8 doing, but he had never had an episode like this.

9 Q Okay. That was when you were working for
10 Barry -- I mean, for [REDACTED]?

11 A [REDACTED], yes, sir.

12 Q Okay. So you're back -- we kind of took a
13 detour here.

14 A That's fine.

15 Q No, that's fine. So you're back, and you
16 go and you see [REDACTED], as you said, to kind of
17 show off?

18 A Like I'm clean, I'm doing good.

19 Q Okay. How does it turn into you -- how
20 does it turn into a situation where you're, you
21 know, working for him or getting trafficked by him
22 or whatever the words you want to use? How does
23 it -- how does it go from, hey, I'm doing good
24 to --

25 A That night -- that night I saw

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1 CERTIFICATE

2 STATE OF GEORGIA:
3 COUNTY OF FULTON:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the
6 caption, and the colloquies, questions and answers
7 were reduced to typewriting under my direction;
8 that the transcript is a true and correct record of
9 the evidence given upon said proceeding.

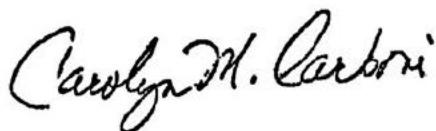
10 I further certify that I am not a relative
11 or employee or attorney of any party, nor am I
12 financially interested in the outcome of this
13 action.

14 I have no relationship of interest in this
15 matter which would disqualify me from maintaining
16 my obligation of impartiality in compliance with
17 the Code of Professional Ethics.

18 I have no direct contract with any party
19 in this action and my compensation is based solely
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this
22 proceeding impacts my absolute commitment to serve
23 all parties as an impartial officer of the court.

24 This the 21st day of November, 2021.

25 

CAROLYN M. CARBONI, RPR, RMR, CCR-B-878